

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

CONSTANCE ALEXANDER and  
PETULA ALEXANDER and DINORAH  
WILLIAMS,

Plaintiff,

v.

STEADFAST INSURANCE COMPANY  
(STEADFAST), CLARENDON  
AMERICAN INSURANCE COMPANY  
(CLARENDON), DEEP SOUTH  
SURPLUS OF TEXAS, L.P., and CRC  
SCU f/k/a CRUMP INS. SERVICES,

Defendants.

CASE NO. 1:20-CV-38

JURY TRIAL DEMANDED

**NOTICE OF DEPOSITION OF STEADFAST INSURANCE COMPANY**

TO: Glenda L. Lake, Clerk of the Court  
District Court of the V.I.

W. Mark Wilczynski  
Justin Crocker, Esq  
Law Office of W. Mark Wilczynski, P.C.  
Palm Passage Suites C20-22  
P.O. Box 1150  
St. Thomas, VI 00804  
Attorney for Steadfast Insurance Company

Deserie Hill  
Hill's Reporting Services  
P.O. Box 307501  
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deshill@msn.com

Alexander, Constance, et. al. v. Steadfast Insurance Company (Steadfast), et. al.

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**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure 26, 30 and 32, Plaintiff, by and through undersigned counsel, will take the oral examination of **STEADFAST INSURANCE COMPANY** on February 13, 2024, at 9:00AM, via Zoom. **This deposition will be conducted via Zoom meeting and pursuant to rules cited above and the standing orders of the Court during the pendency of the COVID-19 pandemic.**

This deposition is being taken for use as evidence and/or trial purposes, and will be continued from day to day until completed.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: February 2, 2024

BY: /s/ Jennifer S. Koockogey-Lajoie  
Jennifer S. Koockogey-Lajoie, Esq.  
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**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on February 2, 2024, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

W. Mark Wilczynski  
Law Office of W. Mark Wilczynski, P.C.  
Palm Passage Suites C20-22  
P.O. Box 1150  
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Attorney for **Steadfast Insurance Company**

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BY: /s/ Jennifer S. Koockogey-Lajoie (al)